

**RM-11785 REPLY COMMENTS BY AB2RA**  
**MARCH 24, 2017**

Replying to the following comments:

Note that this is after the regular filing date closing, but this is within the allotted time for reply comments.

**Matthew Pitts (supporting)**

<https://ecfsapi.fcc.gov/file/1031657798316/My%20RM-11785%20Comments.docx>

“I support the expansion of the 60 Meter band from the current 5 channels to 4 channels and a contiguous segment with VFO use. I do NOT support exceeding the current power limit in any segment that we gain”

“I also find it unnecessary and potentially counterproductive to make any adjustments to the modes permitted on 60 meters at this time.”

**I concur on these points.**

**ARRL (supporting)**

<https://ecfsapi.fcc.gov/file/103200618024737/ARRL%20Comments%20on%20Petition%20for%20Rule%20Making%205%20MHz%20March%202017%20FINAL%20VERSION.pdf>

**I think the ARRL got it essentially right. I hope we can reach an agreement on 100 watts maximum, not anything higher, for reasons stated in their filing as noted. I do not believe the primary users will go along with anything more. Certainly 15 watts is too low. I suggested 30 in my previous reply comment.**

**Ray Soifer (supporting)**

<https://www.fcc.gov/ecfs/filing/1032255326727>

“but pointed out that proposing the adoption of such increased power would likely be opposed by Federal users, which opposition could delay the proceeding, perhaps substantially . If this is indeed the case, I would support ARRL's position, but would suggest that the Commission set a date for review of the situation”

**This was one of the earlier filers who advocated for a much higher power than even 100 watts. I believe that the community would rather see something at 100 watts rather than nothing at 500 watts or higher. I agree with a future review date, as a “sunset clause” with an exact date set at this time, to avoid having to go through another rule making, as the filer suggests.**

**REBUTTAL REPLY TO VARIOUS OTHERS WHO WANTED TO KEEP A CHANNELIZED SYSTEM IN THE NEW PROPOSED SEGMENT:**

This channelization is contrary to what the other countries have done, and may make emergency (or any) communications with those countries difficult. We should allow non- channelization in the newest allocation for most efficient use, and to obtain the maximum number of operational frequencies. Many more contacts, especially if they are narrow band digital, can be fit in the small 15 KHz segment. **I propose that the existing old channel that falls in the new allocation be absorbed into the VFO rules, and the entire new segment be preferentially used for narrow band digital.** This will give the maximum capabilities for emergency communication, as well as normal use for this important asset. **If any SSB voice or wider digital mode is allowed in the new allocation, it should be completely contained within the one old 3 KHz channel located within the new allocation, and be limited to the power level in the new allocation, if that is below 100 watts (perhaps 30 watts). The rest of the new allocation (12 KHz) should be exclusively for narrow band digital or CW.** This prevents incompatible wide band modes from taking all the available channels, monopolizing the limited spectrum. This is in harmony with the effective regulation that the FCC already has in place on the other USA amateur allocations. Narrow band data will be more efficient than voice at getting error free communication, and provide an alternative method to voice, which has to be manually transcribed for distribution to other emergency responders. Many more narrow band digital communications can fit in this small space than voice SSB communications. While 100 watts is an optimistic request, digital communications on the commonly available 100 watt rated SSB transceiver often cannot be used above 30 watts, due to overheating and unacceptable distortion products anyway.

**The FCC should at least consider 30 watts instead of the 15 watts offered, even if they do not favor the 100 watts the ARRL is recommending.**

Respectfully submitted,

/s/

Janis Carson, AB2RA, Extra Class, amateur operator since 1959, ARRL member 40 years